

Joe E. Marshall
Texas Bar No. 13031100
Kathleen M. Patrick
Texas Bar No. 24037243
Lee J. Pannier
Texas Bar No. 24066705
MUNSCH HARDT KOPF & HARR, P.C.
3800 Lincoln Plaza
500 North Akard Street
Dallas, Texas 75201-6659
Telephone: (214) 855-7500
Facsimile: (214) 978-4365
jmarshall@munsch.com
kpatrick@munsch.com
lpannier@munsch.com

Kevin D. McCullough
Texas Bar No. 00788005
Kerry Ann Miller
Texas Bar No. 24050875
ROCHELLE McCULLOUGH LLP
325 N. St. Paul, Suite 4500
Dallas, Texas 75201
Telephone: (214) 953-0182
Facsimile: (214) 953-0185
kdm@romclawyers.com
kmiller@romclawyers.com

**COUNSEL FOR HERITAGE CONSOLIDATED,
LLC, DEBTOR AND DEBTOR IN POSSESSION**

**COUNSEL FOR HERITAGE STANDARD
CORPORATION, DEBTOR AND DEBTOR IN
POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re: §
§
HERITAGE CONSOLIDATED, LLC, *et al.*, § Case No. 10-36484-HDH-11
§
§ Jointly Administered
Debtors. §

**EMERGENCY MOTION TO CONTINUE FINAL HEARINGS ON DEBTORS'
EMERGENCY MOTION FOR ORDER (A) AUTHORIZING INTERIM AND FINAL
USE OF CASH COLLATERAL; AND (B) GRANTING ADEQUATE PROTECTION A
DISCLOSURE STATEMENT [DOCKET NO. 16]; AND DEBTORS' EMERGENCY
MOTION FOR INTERIM AND FINAL ORDERS APPROVING: SECURED
POSTPETITION FINANCING; (II) RELATED PRIMING LIENS AND SUPER-
PRIORITY ADMINISTRATIVE CLAIMS; (III) RELATED SECURED FINANCING
AGREEMENT AND (IV) SCHEDULING A FINAL HEARING [DOCKET NO. 17]**

TO THE HONORABLE HARLIN D. HALE, UNITED STATES BANKRUPTCY JUDGE:

Heritage Consolidated, LLC ("Consolidated") and Heritage Standard Corporation ("HSC") and together with Consolidated, the ("Debtors"), the debtors and debtors-in-possession in the above-captioned bankruptcy cases (the "Bankruptcy Cases"), file this *Emergency Motion to*

Continue Final Hearings on Debtors' Emergency Motion for Order (A) Authorizing Interim and

Final Use of Cash Collateral; and (B) Granting Adequate Protection [Docket No. 16]; and Debtors' Emergency Motion for Interim and Final Orders Approving: (I) Secured Postpetition Financing; (II) Related Priming Liens and Super-Priority Administrative Claims; (III) Related Secured Financing Agreement and (IV) Scheduling a Final Hearing [Docket No. 17] (the "Motion"). In support of the Motion, the Debtors respectfully state as follows:

I. JURISDICTION

1. On September 14, 2010 (the "Petition Date"), the Debtors filed their respective voluntary petitions for relief under Chapter 11 of the United States Bankruptcy Code, 11 U.S.C. § 101, et seq. (the "Bankruptcy Code"), thereby initiating the Bankruptcy Cases.

2. Pursuant to sections 1107 and 1108 of the Bankruptcy Code, the Debtors are operating and managing their business and properties as debtors in possession. On September 24, 2010, a committee formation meeting was conducted by the Office of the United States Trustee and, pursuant to that meeting, the Official Committee of Unsecured Creditors (the "Committee") was formed in the Bankruptcy Cases.

3. This Court has jurisdiction over the Bankruptcy Cases and this Motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue of the Bankruptcy Cases and this Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

II. FACTUAL BACKGROUND

4. On September 15, 2010, the Debtors filed their *Emergency Motion to Continue Final Hearings on Debtors' Emergency Motion for Order (A) Authorizing Interim and Final Use of Cash Collateral; and (B) Granting Adequate Protection [Docket No. 16] (the "Cash Collateral Motion")* and their *Emergency Motion for Interim and Final Orders Approving: (I) Secured Postpetition Financing; (II) Related Priming Liens and Super-Priority Administrative Claims; (III) Related Secured Financing Agreement and (IV) Scheduling a Final Hearing [Docket No.*

17] (the “DIP Motion” and with the Cash Collateral Motion, the “Motions”). A final hearing on the Cash Collateral and the DIP Motions is scheduled for November 23, 2010 at 9:30 p.m, prevailing Central Time (the “Final Hearing”).

5. Since the scheduling of the Final Hearing, the Debtors received a request from counsel for the Official Committee of Unsecured Creditors (the “Committee”) to reschedule the Final Hearing due to an unavoidable conflict.

III. RELIEF REQUESTED

6. By and through this Motion, Debtors request a continuance of the Final Hearing until December 7, 2010, at 9:00 a.m. prevailing Central time.

7. The requested continuance is not for the purpose of delay in these proceedings but rather to permit the Committee to participate in the Final Hearing. The Debtors assert that the proposed continuance is in the best interest of their estates because the Committee is a key player in the Bankruptcy Cases and its participation is critical to their success. Accordingly, cause exists to grant the relief requested herein.

WHEREFORE, PREMISES CONSIDERED, Debtors request that the Court enter an order (i) continuing the Final Hearing, and (ii) granting such other and further relief to which they may be justly entitled.

Dated: November 18, 2010.

Respectfully Submitted,

MUNSCH HARDT KOPF & HARR, P.C.

By: /s/ Joe E. Marshall

Joe E. Marshall
Texas Bar No. 13031100
Kathleen M. Patrick
Texas Bar No. 24037243
Lee J. Pannier
Texas Bar No. 24066705
3800 Lincoln Plaza
500 North Akard Street
Dallas, Texas 75201-6659
Telephone: (214) 855-7500
Facsimile: (214) 978-4365
jmarshall@munsch.com
kpatrick@munsch.com
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**COUNSEL FOR HERITAGE
CONSOLIDATED, LLC, DEBTOR AND
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-and-

ROCHELLE McCULLOUGH LLP

By: /s/ Kevin D. McCullough

Kevin D. McCullough
Texas Bar No. 00788005
Kerry Ann Miller
Texas Bar No. 24050875
325 N. St. Paul, Suite 4500
Dallas, Texas 75201
Telephone: (214) 953-0182
Facsimile: (214) 953-0185
kdm@romclawyers.com
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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on November 18, 2010, she spoke with Erin Schmidt on behalf of the Office of the United States Trustee, who confirmed that she does not oppose the relief requested in the foregoing Motion.

/s/ Kathleen M. Patrick
Kathleen M. Patrick

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 18, 2010, a true and correct copy of the foregoing Motion was served on all parties requesting electronic service through this Court's ECF system and on the parties shown on the attached service list by first class U. S. mail.

/s/ Kathleen M. Patrick
Kathleen M. Patrick